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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

TYLER MILLER, an individual

Plaintiff,

v.

HENRY HEIMULLER, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; BRUCE HOLSEY, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; JEFF FLATT, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; and SHELLEY HENNESSY, in her official capacity as Board Member of the Columbia 9-1-1 Communications District,

Defendants.

Case No 3:23-cv-00293-SI

**DECLARATION OF MICHAEL FLETCHER IN SUPPORT OF OPPOSITION TO MOTION FOR TEMPORARY RESTRAINING ORDER**

I, Michael Fletcher, declare as follows:

1. I am the executive director of Columbia 9-1-1 Communications District. I have held that position since April 2018.
2. I make this declaration in support of the defendant's opposition to the plaintiff's motion for a temporary restraining order.
3. In 2020, C911 employee Chandra Egan reported to me that she had been harassed and intimidated in the past by Mr. Miller while he was a reserve deputy for Columbia

County. She provided me with a set of text messages she had received from Mr. Miller, [REDACTED]

[REDACTED] At the time, no in-person board meetings were being held due to COVID restrictions. Further, the C911 offices were closed to all but staff due to COVID restrictions.

4. In late 2022 and early 2023, Ms. Egan and other employees came to me with complaints about Tyler Miller's conduct because the board meetings were again open to the public and they were concerned about new harassment, intimidation, and bullying by Mr. Miller. Further, employees expressed fear for their safety because they had a belief that Mr. Miller was attempting to become reinstated as a reserve deputy with Columbia County, which would provide him access to the district facilities.

5. In the past few months, Mr. Miller has become increasingly hostile towards C911. He monitors all C911 radio communications on a 24-hour, seven-day-a-week basis and criticizes dispatchers for their performance.

6. Ms. Egan , Ms. Hooper, another District employee, and other employees reported to me that they were fearful and concerned about attending board meetings as required by their job duties because of Mr. Miller's presence at the board meetings and his behavior after the meetings.

7. I believe that Mr. Miller presents an imminent threat to me and District employees if he is allowed back on C911 premises.

8. If Mr. Miller is allowed to personally attend C911 board meetings, one or more employees will not personally attend the public meeting.

9.. As a result of employee safety, harassment, and intimidation concerns being raised by staff, the board issued Mr. Miller the “no trespass and no contact” notice letter.

**Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.**

DATED this 7<sup>th</sup> day of March 2023.



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Michael Fletcher

CERTIFICATE OF SERVICE

I hereby certify that on the 7<sup>th</sup> day of March, 2023, I served the foregoing

**DECLARATION OF MICHAEL FLETCHER IN SUPPORT OF OPPOSITION TO  
MOTION FOR TEMPORARY RESTRAINING ORDER** on the following party at the  
following address:

Clifford S. Davidson  
Drew L. Eyman  
Snell & Wilmer LLP  
1455 SW Broadway Ste 1750  
Portland OR 97201  
*Of Attorneys for Plaintiff*

by electronic means through the Court's Case Management/Electronic Case File system.

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*/s/ Karen O'Kasey*  
Karen O'Kasey